

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04 CR 10314 RCL
)	
MANUEL E. PINALES, et al.)	
_____)	

JOINT MOTION TO CONTINUE RULE 11 HEARING

The United States of America and the defendant, Manuel Pinales, hereby move this Court to continue the Rule 11 hearing, presently scheduled for May 24, 2006 at 2:30 p.m., to a date after June 12, 2006 to be determined by the Court. As reasons therefore, the parties state that they are continuing to negotiate a plea agreement and need additional time to finalize the plea agreement prior to the Rule 11 hearing.

Dated: May 19, 2006

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Maureen B. Hogan
Maureen B. Hogan
Assistant U.S. Attorney

Manuel E. Pinales
By his attorney,

/s/ Steven J. Rappaport
Steven J. Rappaport, Esq.